

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRYAN TURNER,	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 20-4502
	:	
CITY OF PHILADELPHIA,	:	
Defendant.	:	

OFFER OF JUDGMENT

TO: Leonard K. Hill, Esquire
Hill & Associates
1700 Market Street, Suite 3150
Philadelphia, PA 19103
Counsel for Plaintiff
(by email delivery)

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant, City of Philadelphia, by and through its attorney, Elizabeth Okakpu, Assistant City Solicitor, hereby offers to allow Judgment to be taken against it and in favor of Plaintiff, Bryan Turner, for all claims for damages, costs, attorneys' fees, and interest accrued to date, in the amount of twenty-six thousand dollars (\$26,000.00).

This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed either as an admission that the Defendant, or any of its employees or agents, is liable in this action, or that the plaintiff has suffered any damages. This judgment is to have no effect whatsoever except in settlement of this case. Additionally, this Offer of Judgment is not admissible as evidence in any proceeding, except, if rejected, in a proceeding to determine costs. If this Offer of Judgment is not accepted in writing within fourteen (14) days, it shall be deemed withdrawn.

CITY OF PHILADELPHIA LAW

DEPARTMENT

Diana Cortes, City Solicitor

Renee Garcia, Litigation Chair

Nicole S. Morris, Chief Deputy

/s/Elizabeth U. Okakpu

Elizabeth U. Okakpu

Assistant City Solicitor

City of Philadelphia Law Department

Division of Labor and Employment

1515 Arch Street, 16th Floor

Philadelphia, PA 19102

(215) 683-5132 (phone) / (215) 683-5099 (fax)

Elizabeth.Okakpu@phila.gov

Counsel for City of Philadelphia

Dated: July 28, 2022